

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

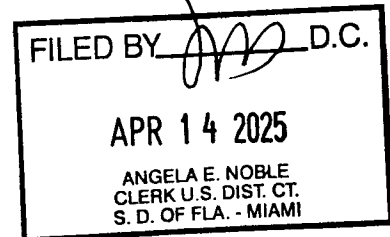
CASE NO. 22-CR-220209-KMM

UNITED STATES OF AMERICA

VS.

RICARDO RODRIQUEZ-OTERO

DEFENDANT



WORK RELEASE REQUEST

The Defendant, Ricardo Rodriguez-Otero, hereby file this motion to court for a work request once he is released from prison so he can blend into and again be part of society.

CASE HISTORY

The defendant was adjudicated guilty of the following offense, 21 U.S.C. §841(a)(1), distribution of a controlled substance. His sentence was for sixty (60) months which he served without incident. He is to be released on May 29,2025 to the halfway house.

LEGAL ARGUMENT

The purpose of prison is to rehabilitate a defendant and not to punish him. In fact, from day one in prison, identifying an inmate's individualized "criminogenic" needs is the first step. The Bureau of prison embraces a correctional philosophy that reentry preparation must begin on the first day of incarceration.

This is referred to as “criminal rehabilitation”. Criminal rehabilitation is essentially the process of helping inmates grow and change, allowing them to separate themselves from the environmental factors that made them commit a crime in the first place.

This in turn means if an inmate learns a different way of living their lives, they’ll be less inclined to commit crimes in the future. Rehabilitation is the process of re-educating and preparing those who have committed a crime, to re-enter society. The goal is to address the underlying root causes of the crime to ensure inmates will be able to live a crime-free lifestyle once they are released from prison.

No question, the rehabilitation process prevents future crime by altering a defendant’s behavior. Examples include educational courses and vocational programs, treatment center placement and counseling.

In the instant case, this has been fulfilled and now the Defendant is prepared to re-enter society. He is classified as a low custody inmate and as such should be provided an opportunity to begin reentrance to society. Acquiring a job will do just that.

EMPLOYMENT OPPORTUNITY

The place where the inmate wants to work in which the company has a job for him is Joyeria Jovanni. The address of the business is 4635 NW 7th Street, Miami, Florida and the phone number is 305-443-5757. He has many years of experience working in a jewelry store, of which this store is owned and operated by his brother.

CONCLUSION

Based upon the above arguments made in fact and law, the Defendant humbly requests that this court approve the Defendant’s request to work

while at the halfway house and pursue the employment opportunity as noted in this motion.

Respectively submitted,

Jh OK 4/8/25

Ricardo Rodriquez-Ortez

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